



U.S. Environmental Protection Agency

Applicability Determination Index

Control Number: 9600019

Category: NSPS
EPA Office: Region 6
Date: 05/03/1996
Title: Waiver Of Perf. Test Subpart GG; Notice Of Startup
Recipient: Morrill, Dean
Author: Ascenzi, Donna

Subparts: Part 60, GG, Stationary Gas Turbines

References: 60.332
60.7
60.8

Abstract:

Q: An NSPS Subpart GG turbine requests a waiver of the requirement to conduct initial performance testing pursuant to 40 CFR 60.8(b)(4); does EPA grant the waiver? Can the requirement to notify of startup be waived?

A: Yes, EPA makes a preliminary determination that the requirement to perform initial compliance testing should be waived; an identical turbine operated at the same site and using the same fuel met the standards and did so within a large margin as evidenced during testing. No, the startup notification must be made as required.

Letter:

May 3, 1996

Mr. Dean Morrill
Project Team, Engineering Services Section
Enforcement Division
Texas Natural Resource
Conservation Commission
P.O. Box 13087
Austin, TX 78711-3087

Re: Request for performance test waiver and start-up notification at El Paso Electric Company, Newman Station Unit 4, Turbine GT-2

Dear Mr. Morrill:

By letter dated May 19, 1995, you requested a New Source Performance Standard (NSPS) determination under Title 40, Code of Federal Regulations (CFR) Part 60 (40 CFR 60). You forwarded a request from El Paso Electric Company (EPEC) for a waiver of the requirement to conduct initial performance testing at Newman Station, Turbine GT-2 pursuant to 40 CFR 60.8(b)(4). The gas turbine is subject to NSPS Subpart GG.

A waiver can be granted, under 40 CFR 60.8(b), if the owner or operator of a source has demonstrated "to the Administrator's satisfaction that the affected facility is in compliance with the standard." We have reviewed EPEC's request, and we have discussed the request with EPEC. It is our understanding that the second turbine can meet both the nitrogen oxides (NOx) and sulfur dioxide (SO2) emissions standard. Monitoring data was submitted in support of this.

We are making a preliminary determination that the requirement to perform initial compliance testing should be waived. Two factors in this case enable us to conclude that the affected gas turbine will be operated in compliance with the standards. The first is that an identical turbine operated at the same site and using the same fuel met the standards. The second factor is that the turbine meeting the standards did so within a large margin as evidenced during March 8, 1995 testing. NOx emissions averaged from 0.00282 to 0.00392 percent by volume at 15 percent oxygen and on a dry basis, far less than the 0.0137 percent by volume emission standard (on the same basis) required by 40 CFR 60.332(a)(1). In addition, the hydrogen sulfide content of fuel gas did not exceed the detection limit of 5 ppm, thus indicating a fuel sulfur content well below the 0.8 percent by weight standard required by 40 CFR 60.333(b).

Your agency has been delegated the authority to grant a waiver of emission tests authorized in 40 CFR 60.8(b). If you agree with our preliminary determination, your agency may grant a waiver to EPEC from the requirement to conduct performance testing in 40 CFR 60.8(a). Please send me a copy of any waiver of emission tests issued by your agency under 40 CFR 60.8(b).

In regard to the start-up notification requirement in 40 CFR 60.7(a)(2), the Environmental Protection Agency does not allow a relaxation of the requirement. An affected facility must notify the regulatory authority of initial start-up not less than 30 days prior to the anticipated start-up date.

Should you need any additional information regarding this matter, please contact Mr. Daniel Meyer, of my staff, at 214-665-7233.

Sincerely yours,
/s/

Donna Ascenzi
Chief
Air Enforcement Section (6EN-AA)

cc: Ms. Jeanne Philquist, TNRCC
Mr. Archie Clouse, TNRCC Region 6 - El Paso
Mr. Mark Rodriguez, El Paso Electric Company